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May 31, 2019

Via ECF

The Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Doug Whitman, 12 Cr. 125 (JSR)

Dear Judge Rakoff:

We respectfully move for reconsideration of the Court's Order entered May 30, 2019, insofar as it denied extending Mr. Whitman's travel restrictions to the District of Idaho—which is the primary location he wishes to visit freely. Throughout the year, there are a number of events in Idaho that Mr. Whitman would like to attend, including board meetings and other work for the Sun Valley Wellness Festival and Conference (“SVWFC”), the Conference itself, the SVWFC writer's conference (of which Mr. Whitman is both a sponsor and an attendee), and a symphony series (of which Mr. Whitman is both a sponsor and attendee). Again, Mr. Whitman has owned a home in Sun Valley/Ketchum for years; his brother owns a home [REDACTED]

[REDACTED] Accordingly, Mr. Whitman would like to be able to travel to his second home and visit with his family members in Idaho throughout the year, with the flexibility and freedom to do so on short notice, without requiring the approval of a Probation Officer two weeks in advance of every trip [REDACTED]

[REDACTED]. Mr. Whitman was permitted to travel freely to Idaho from the very first day he was charged in this case over seven years ago, and he continued to do so both before and after his conviction, for much of the summer before he entered prison, and for an uninterrupted three-year span from 2016-2019. There is no reason to believe that his continued free travel to Idaho at this time would present any risk to the public or frustrate any purpose of supervision. In short, we respectfully submit that denying him the ability to travel freely to Idaho is a condition “greater than necessary” to achieve the purposes of the sentencing statute. Thank you very much for your consideration of this application.

Respectfully submitted,

David M. Rody

cc: AUSA Margaret Graham